

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

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Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
INTEGRATED CONFIGURATION MANAGEMENT PROJECT

Virginia Electric and Power Company (Virginia Power) has voluntarily initiated a major project intended to address potential regulatory concerns involving the current design and licensing bases for the Surry and North Anna Power Stations. The initiative, designated the Integrated Configuration Management Project, goes beyond the level of scrutiny normally applied to the current licensing basis through routine surveillance and quality assurance activities. This initiative is intended, in part, to provide the NRC with added confidence and assurance that Surry and North Anna are being operated and maintained in full compliance with their current licensing bases, and that any departures from those bases are reconciled in a timely manner. Various activities involving design and licensing bases information, the updated Final Safety Analysis Reports, and the Improved Technical Specifications have been consolidated into this project.

The initiative is intended to build on the information Virginia Power had previously submitted to the NRC in a letter dated February 7, 1997 (Serial No. 96-535) regarding the adequacy and availability of Surry and North Anna design bases information. That information, submitted pursuant to 10 CFR 50.54(f), was similarly intended to provide the NRC with added confidence and assurance that Surry and North Anna Power Stations are operated and maintained within their design bases and that any deviations are reconciled in a timely manner. This letter also fulfills a voluntary commitment made to the NRC at that time to submit a UFSAR review and validation plan.

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The Integrated Configuration Management Project consists of seven activities. The activities, commitments, and the project schedule are described in the enclosure. Certain project programs directly address the current regulatory concerns, while others implement supporting or complementary activities, but all are necessary to support the initiative's primary goal. Particular attention has been paid to ensure that the plan meets NRC's expectations for licensee initiatives intended to identify potential departures from the updated FSAR. Specific Virginia Power commitments associated with the Integrated Configuration Management Project are identified in the enclosure and are summarized below:

1. Complete the Surry and North Anna UFSAR Validation Program Phase I activities by October 18, 1998.
2. Conduct a broad-scope root cause evaluation of departures from the UFSAR.
3. Conduct an assessment of change processes to ensure the integrity of the current licensing basis.

For completeness, two other commitments associated with the project that were documented in separate correspondence are restated here:

4. Issue the Surry and North Anna design basis documents by June 30, 1999 (Virginia Power letter dated February 7, 1997 (Serial No. 97-535)).
5. Submit the proposed North Anna and Surry ITS license amendments in February and April 1999, respectively (Virginia Power letter dated March 27, 1997 (Serial No. 97-091A)).

In addition to publicly submitting this initiative in writing, we have met with appropriate NRC management and staff to brief them on the project. If you have any questions, please contact us.

Very truly yours,



James P. O'Hanlon
Senior Vice President - Nuclear

Enclosure

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**Virginia Power
Integrated Configuration Management Project**

Executive Summary

Virginia Electric and Power Company (Virginia Power) has voluntarily initiated a major project intended to address potential regulatory concerns involving the current design and licensing bases for the Surry and North Anna Power Stations. The initiative, designated the Integrated Configuration Management Project, is intended, in part, to provide the NRC with added confidence and assurance that Surry and North Anna are being operated and maintained in full compliance with their current licensing bases, and that any departures from those bases are reconciled in a timely manner. Various Virginia Power activities involving design and licensing bases information, the Updated Final Safety Analysis Reports (UFSARs), and the Improved Technical Specifications (ITS) have been integrated in this project. The project consists of distinct but closely-related activities with clear project milestones:

- Preparation of design basis documents (DBD). The DBD program, in conjunction with other configuration management activities, establishes the design bases for the plants and serves as a means for maintaining and controlling changes to the plant's design basis. The DBDs will be issued by June 30, 1999.
- Improving the Updated Final Safety Analysis Reports. The content of the Surry and North Anna UFSARs will be validated by October 1998 for consistency with design and operating information. The activity is directly responsive to the incentive offered by the NRC in its October 18, 1996 enforcement policy on departures from the UFSAR. Various format and content enhancements will also be implemented, as appropriate.
- Improving the Technical Specifications. License amendments will be prepared and submitted in February and April 1999 to convert, respectively, the current North Anna and Surry Technical Specifications from their current form to that of the Improved Technical Specifications (NUREG 1431).
- Integrated reviews of design and licensing bases information. Extensive design, licensing, and operating information will be assembled and evaluated by expert, knowledge-based, multi-disciplinary teams utilizing detailed work instructions and robust information systems to demonstrate compliance with each station's design and licensing bases. The integrated reviews are also the primary means by which the project demonstrates that the design and operation of Surry and North Anna are consistent with their UFSARs.

- Developing information systems. Information systems needed to support the overall project, and to improve the accessibility of design and licensing bases information, will be developed and maintained.
- Improving configuration management. The root cause of departures from the UFSAR will be identified to ensure that the project's corrective actions are effective and comprehensive. Existing change processes will be reviewed to ensure the integrity of the design and licensing bases information is maintained. Independent assessments of project activities will be conducted. Appropriate, process-oriented training will be implemented.

The Integrated Configuration Management Project is a substantial undertaking initiated by Virginia Power. A new project organization has been established with adequate staffing and resources to accomplish the above tasks in the timeframes required.

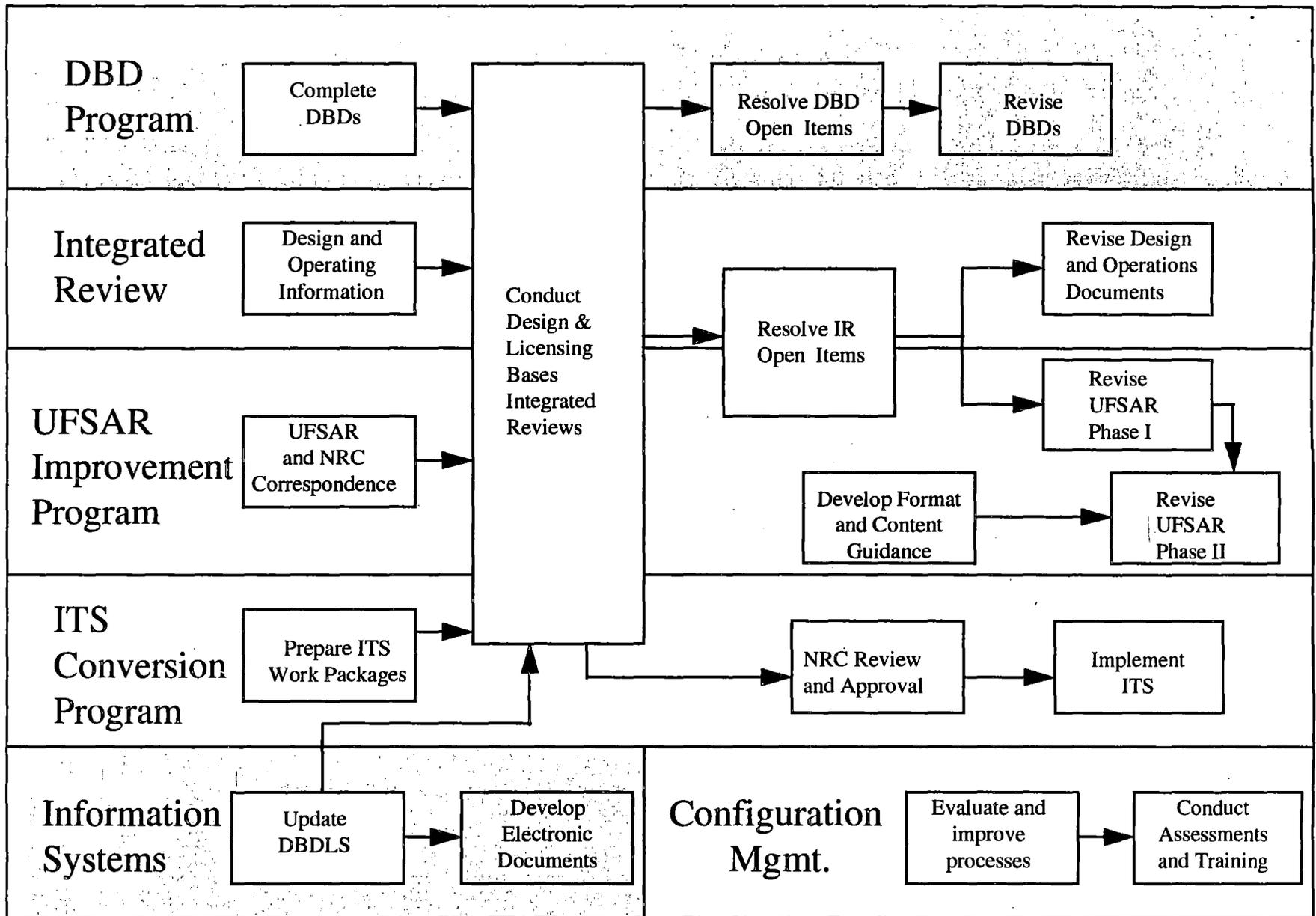
Virginia Power Integrated Configuration Management Project

Introduction

The Integrated Configuration Management Project is designed to integrate and manage ongoing Virginia Power's efforts associated with improving design and licensing basis information, validating the Updated Final Safety Analysis Reports (UFSAR), converting to the Improved Technical Specifications (ITS), and ensuring compliance with the current design and licensing bases for the Surry and North Anna Power Stations. The project consists of seven distinct but closely-related activities. As illustrated by the figure on the following page, three programs--the Design Basis Document (DBD), UFSAR Improvement, and ITS Conversion Programs--develop their own products and serve as feeder programs to the Design and Licensing Bases Integrated Review Program. A fifth program, the Information Systems Development Program, provides the necessary information systems support by ensuring ready access to design, licensing and operating documents, while the sixth program, the Configuration Management Process Improvement Program, addresses various process issues. The seventh activity (not shown), Project Management, provides management oversight and direction for the project.

The cornerstone of the project is the Design and Licensing Bases Integrated Review Program. Within that program, design, licensing, and operating information is assembled and evaluated utilizing expert, knowledge-based multi-disciplinary teams, supported by robust information systems and utilizing detailed work instructions to validate the plant design basis, current licensing basis, and plant operation. When necessary, physical verifications are conducted by walking down the plant. Implementing appropriate and timely corrective action is an integral part of the program.

Each of the seven activities is described on the following pages. The project schedule is described and specific commitments are documented. Following the descriptions, a comparison is provided of various attributes within the programs to the NRC's expectations with respect to licensee initiatives intended to address departures from the UFSAR.



Program Descriptions

UFSAR Improvement Program

The primary goals of the UFSAR Improvement Program are to confirm that the design and operation of Surry and North Anna Power Stations are in full compliance with their current licensing bases (CLB), to resolve any inconsistencies in a timely and comprehensive manner, and to maintain the integrity of the CLB as change occurs in the future. Implementing timely corrective action for any inconsistencies identified is an integral part of the program. The program also determines whether there are unknown unreviewed safety questions that have not been previously identified and addressed.

The program is divided into two phases: In Phase I, efforts are directed at validating information in the UFSAR, identifying and correcting inaccurate or incomplete information, and removing inappropriate information. In Phase II, the focus is on enhancing and improving the document to better reflect the current licensing basis, and in revising UFSAR format and content to better support an operating nuclear facility. Where appropriate, information and references generated during Phase I are documented and maintained to support Phase II enhancements. Although the two phases run concurrently, Phase I activities have priority to ensure that validation activities are completed within the specified project schedule.

The basic methodology for achieving the program's goals is to conduct a rigorous comparison of the Surry and North Anna design bases and operating practices against information in the current licensing basis. That review, for the most part, is conducted as part of the design and licensing bases integrated reviews, described later in this attachment.

In general, the information necessary to support the review is obtained from three primary sources: System, plant and accident analyses design basis documents for design bases information, station operating and administrative policies, programs, and procedures for operating information, and the UFSARs and other docketed licensing correspondence for CLB information. Each of the primary information sources are augmented, as necessary, to ensure that the most complete information available for the review is obtained.

The various design basis documents serve as directories or roadmaps to design information. They also provide, in definitive statements, descriptions of design

requirements of plant systems, structures, and components (SSCs), environmental conditions under which the plant SSCs must perform, applicable codes and regulatory requirements, design parameters, redundancy requirements and physical arrangements required for various modes of operation and design basis events. Station policies, programs, and procedures serve as the administrative controls to ensure station operations are maintained within design assumptions and parameters, and that station operations are consistent with the regulatory requirements and commitments described in the CLB. While the UFSARs represent the single largest source of CLB information, other relevant types of CLB information (e.g., bulletin responses, generic letter responses, NOV responses, Licensee Event Reports, operating license amendments) are also identified and validated.

Because the principal design and operations documents are organized in large part on a system basis, the design and licensing bases integrated review methodology is system-based. However, the UFSARs contain various nonsystem-based (e.g., quality assurance, personnel qualifications) or integrated system (e.g., accident analyses) information developed in response to various regulatory requirements or guidance. Thus, in addition to the system-based UFSAR validation reviews, additional topical reviews of the UFSAR are conducted to ensure completeness.

Because the information developed during this task is used to support other activities, the information to be collected during the reviews is clearly defined, documented, and a mechanism for controlling, accessing, and maintaining the information and associated cross-references is established and maintained through a computerized database.

Implementing comprehensive corrective action is an integral part of the project. In the process of developing design basis documents described below, open items related to the UFSAR requiring further action are identified. Detailed criteria and guidance are developed and utilized in Phase I to ensure the appropriate disposition of those UFSAR-related open items on a timeframe consistent with their safety significance. An important aspect of the UFSAR Improvement Program is that any inconsistency identified related to the UFSAR that meets the threshold for entry into the Appendix B corrective action system is resolved within the program in a timely manner utilizing project resources. Similarly, criteria and guidance are established and utilized to ensure that any previously unidentified unreviewed safety questions are discovered during the integrated review process. Finally, administrative controls are promulgated to appropriately assign responsibility, track, resolve, and disposition any

inconsistencies that do not meet the threshold for entry into the corrective action system.

As stated above, UFSAR improvement activities that do not directly support validating the current UFSAR content are addressed separately under the Phase II portion of the UFSAR Improvement Program. Activities under Phase II include an assessment of the various ways in which the UFSAR is utilized to support an operating nuclear facility, the development of detailed UFSAR format and content guidance to support those uses, and the implementation of various format and content enhancements. It is envisioned that efforts within the Phase II program include both plant-specific enhancements to the documents, as well as a leadership role in potential NRC or industry initiatives.

Design Basis Document Program

The objective of the Design Basis Document (DBD) Program is to identify, assimilate, consolidate, and document the design bases of the Company's nuclear power stations, Surry and North Anna. The DBD Program, in conjunction with other configuration management activities, establishes the design bases for the plants and serves as a means for maintaining and controlling changes to the plant's design basis. The program is well-described in Attachment A of our February 11, 1997 response to NRC's Request for Information pursuant to 10 CFR 50.54(f) regarding the adequacy and availability of design bases information.

Certain documents and support systems prepared and utilized by the DBD Program provide input and are used in support of the Design and Licensing Bases Integrated Review Program. Those documents include system and plant design basis documents, as well as other documents contained in the Design Basis Document Library Series (DBDLS).

System Design Basis Documents (SDBDs) serve as a road map or directory to more detailed supporting information. The SDBD is an assimilation and compilation of existing design information that is documented in a consistent, logical, and systematic manner. Each major system installed in the plant is covered by a separate SDBD. The SDBDs are periodically updated.

The Plant Design Basis Document (PDBD) represents a consolidation of common design basis information within a single document to avoid extensive duplication in the applicable SDBDs. The PDBD establishes, summarizes, and defines the specific design criteria and design requirements of the nuclear

facility, including those features applicable to the site, building, and structures. It addresses features that are applicable to multiple systems such as seismic design, cabling, and piping, and it identifies the plant safety analysis design bases. Normally, information contained in the PDBD is not repeated in the SDBDs.

The Design Basis Document Library Series (DBDLS) is a computer-based application that uses CD-ROM technology to store data and images. Documents containing design, engineering, and licensing information are included in the DBDLS. The documents are organized and indexed so that they can be easily researched and the desired design or licensing information retrieved.

During the development of the design basis documents, open items requiring further action are identified. Detailed criteria are developed and utilized to ensure the appropriate disposition of each open item on a timeframe consistent with its safety significance.

Design and Licensing Basis Integrated Review Program

The Design and Licensing Bases Integrated Review Program serves as the primary engine that drives the Integrated Configuration Management Project. Within that integrated review, comprehensive design, licensing and operating information is assembled and evaluated utilizing expert, knowledge-based multi-disciplinary teams to validate the plant design basis, the current licensing basis, and actual plant operations. Conflicts or inconsistencies with the current Technical Specifications and the UFSARs are identified. Appropriate and timely corrective action for any conflicts or inconsistencies identified is an integral part of the program.

The reviews are conducted by teams of individuals with extensive Surry and/or North Anna operations, engineering, and licensing expertise following detailed work instructions. The reviews are performed utilizing controlled information to the maximum extent possible to minimize intrusion into plant operations. However, when necessary, plant walkdowns, personnel interviews, or other tools are used to ensure the thoroughness of the reviews.

During the design and licensing bases integrated reviews, the SDBDs and PDBDs, and referenced design and licensing documents are assembled and studied. A design and licensing basis validation package is prepared. Utilizing that package, engineering and operations documents are validated to be consistent with the design basis. The current Technical Specifications and

UFSARs are validated to be consistent with both the current design and licensing bases. Licensing commitments are validated to be contained in plant administrative and operating procedures. Document discrepancies are identified and resolved. UFSAR and other document changes are initiated, and the proposed ITS and ITS Bases are validated against the current design and licensing bases.

Corrective action is the integrated review team's responsibility. A process is defined to disposition inconsistencies as identified. The process utilizes either the existing deviation reporting and corrective action system or, due to the magnitude of the validation effort, utilizes an alternative process that fully meets the 10 CFR 50 Appendix B corrective action criteria.

Criteria are established to assist in the identification of unreviewed safety questions. Similarly, administrative controls are promulgated to appropriately assign responsibility, track, resolve, or otherwise disposition inconsistencies that do not meet the threshold for entry into the corrective action system.

The expected output of the design and licensing bases integrated reviews are validated SDBDs, PDBDs, ITS and ITS Bases, UFSARs, and station operating and administrative procedures that implement licensing commitments or ensure that the plant is operated within the constraints of the design basis. Revisions, as necessary, to the various operating, design, or licensing documents and, when appropriate, modifications to the plant design are initiated.

To ensure an effective integrated review process, a pilot review on a selected system is first conducted prior to launching the full-scale reviews. To ensure acceptable review results, an independent assessment of the outputs from the integrated reviews is conducted at the appropriate time, and adjustments to processes and guidance are implemented accordingly.

Improved Technical Specifications Conversion Program

The primary goal of the Improved Technical Specifications Conversion Program is to convert the current Surry and North Anna Technical Specifications from their current form to that of the ITS (currently published as NUREG-1431, Rev. 1, with Rev. 2 in development).

The scope of activity is the complete conversion of the Surry and North Anna Technical Specifications in their present form and as amended during the course of the project until a pre-established point ("cutoff date") prior to submittal of the

proposed license amendments to the NRC. Incorporation of other proposed technical changes to the current Technical Specifications is outside the scope of the project unless the proposed technical changes contribute to the overall success of the conversion. The scope includes identifying and coordinating the development of the programs and procedures necessary to implement and maintain the ITS. An assessment of the expected training and procedure impacts is conducted. Actual training development and implementation, as well as procedural changes are implemented by the existing training and procedures organizations with project assistance.

In general, the ITS conversion methodology involves several activities. The current Technical Specification requirements suitable for relocation to licensee controlled documents are identified. The "retained" requirements are converted from their current form to the format and content of the Improved Technical Specifications. The "technical" changes that are a natural consequence of the conversion process (e.g., revised AOTs and surveillance frequencies or new LCOs contained in the NUREG) are converted and justified. Finally, the programs and procedures necessary to implement and maintain the ITS (and relocated requirements) are developed.

The development, review and approval methodology takes full advantage of the industry guidance contained in NEI 96-06, "Improved Technical Specifications Conversion Guidance," dated August 1996, as well as additional guidance issued by NRC on December 13, 1996 that is based on recent experience with applications currently under review.

To implement the program, a team with specialized experience in the ITS conversion process is utilized. The team conducts screening of current Technical Specifications requirements against published NRC criteria to determine whether the requirements are improved or relocated, creates the individual work packages, and coordinates the review and approval of the individual work packages through various nuclear safety, operating, and on- and offsite safety committee reviews. The individual ITS packages are processed by the Design and Licensing Bases Integrated Review Teams to validate that the proposed ITS requirements and ITS Bases are consistent with the current design and licensing bases. Finally, the individual work packages are assembled into a single submittal, subjected to appropriate quality reviews and management approvals, and submitted to the NRC. The program continues to support the submittals throughout the NRC review and approval period.

The ITS Conversion Program identifies and coordinates the development of the various programs and procedural controls necessary to implement and maintain ITS and the relocated technical requirements, and to develop and implement training to support Nuclear personnel involved in the conversion and subsequent use of ITS.

Emphasis is placed on maintaining a close liaison with, and monitoring the interactions of the NEI Technical Specification Task Force and other industry groups with the NRC. That liaison ensures that any proposed generic changes to the current ITS standard (NUREG 1431, Rev. 1) approved by the NRC, or other NRC/industry activities that impact the current standard or the preparation of the ITS submittals, are identified and addressed.

Information Systems Development Program

The Information Systems Development Program is intended to develop the computer software applications, administer and maintain the systems and applications necessary to support the overall Integrated Configuration Management Project, and improve the overall accessibility of design and licensing bases information. Primary activities include the update, maintenance, and availability of the DBDLS to ensure ready access by the DLBIR teams to design and licensing documents. In addition, the program is tasked with the development of electronic versions of the DBDs, the Phase II UFSARs, and the Surry and North Anna ITS. (Note: The current UFSAR, current Technical Specifications, and station procedures are being converted to electronic format as part of a separate, previously established program within Virginia Power.)

The Information Systems Development Program is also tasked with the evaluation of processes to determine automation requirements, the development of software requirements (from a process standpoint), and the identification of other system enhancements in support of configuration management.

Configuration Management Process Improvement Program

There are several tasks within the Configuration Management Program that have a direct impact on maintaining the integrity of the UFSARs and the CLB. Those tasks involve identifying the root cause of departures from the UFSAR to ensure that corrective actions are effective and comprehensive, ensuring the quality of existing change processes by determining whether each change process has the appropriate attributes to ensure that planned changes occur in accordance with acceptable change mechanisms, performing independent assessments of

Integrated Configuration Management Project activities, and developing and implementing appropriate process-oriented training.

Both formal and informal change processes exist at the nuclear stations. Formal change processes include Virginia Power corporate and station policies, programs, procedures, and other administrative controls. Informal processes include general work practices, memoranda, or unwritten rules. Appropriate regulatory change mechanisms and sequences for implementing acceptable changes are prescribed in NRC regulations (i.e., 10 CFR 50.54, 50.59, 50.71(e), 50.90, and Appendix B to Part 50). A review of Virginia Power's change processes is performed to ensure that the controls required under the prescribed regulatory change mechanisms and sequences are contained within the processes. Special attention is paid to subtle change drivers that have the potential to modify the current design and licensing bases through informal means. The processes are modified, as necessary, to ensure that the integrity of the UFSARs and the CLB is maintained.

Over the years, Virginia Power has implemented several UFSAR improvement programs. Those programs have implemented hundreds of individual changes to UFSAR content and change processes. In spite of those efforts, departures from the UFSAR have continued to occur. The program includes a task for conducting a root cause evaluation targeted at assessing the programs and processes that have resulted in departures from the FSAR over the years. This task first determines the appropriate methodology to be employed to address an evaluation of this type, and then performs an appropriate evaluation to identify the root cause of inconsistencies between the design and operation of the nuclear plants and the information contained in the Surry and North Anna UFSARs. The assessment is intended to be broad in scope, examining management controls and processes at a higher level rather than identifying the root cause of individual inconsistencies. The task utilizes individuals trained in appropriate assessment methodologies. The individuals performing the task are selected for their objectivity and are independent from the programs and processes evaluated. Information from UFSAR content assessments recently performed in support of an industry initiative, other Virginia Power task team efforts initiated over the years, and the results of the pilot program established for the design and licensing bases integrated reviews are all factored into the root cause evaluation. The findings and recommendations of the root cause evaluation team are then reviewed by management, and appropriate revisions to the configuration management processes are implemented.

In order to test the effectiveness of the Integrated Configuration Management Project and ensure that the stated goals are being achieved, assessments are conducted at appropriate times during the course of the project. Both self and independent assessments may be utilized to determine whether modifications to various project program processes are necessary.

Appropriate sensitivity by Nuclear personnel to maintaining the integrity of the current licensing basis is a critical factor in ensuring acceptable regulatory performance. Training requirements, in terms of existing processes or process enhancements, are assessed and appropriate training developed and implemented. The training also instills, or reinforces as necessary, a questioning attitude among Nuclear personnel with respect to the UFSAR, the current licensing basis, and the potential for proposed changes to adversely impact the integrity of the current licensing basis.

Project Management

The Integrated Configuration Management Project is a substantial undertaking initiated by Virginia Power. A new project organization has been established with adequate staffing and resources to accomplish the assigned tasks in the timeframes required. In support of the project, the project management function directs and supports the activities required to develop and maintain project schedules and cost plans, develops and maintains work instructions and project procedures, manages work activities to ensure quality and completeness, keeps management apprised of project status, and supports any necessary regulatory or industry interface.

Project Schedule and Commitments

As described above, the Integrated Configuration Management Project consists of seven activities. Certain programs within the project have specific milestones for various tasks that can form the basis for specific commitments. Others are support programs whose schedules and activities effectively extend for the duration of the entire project and are driven in large part by other major program milestones.

The UFSAR Improvement Program Phase I (i.e., validating the information in the current Surry and North Anna UFSARs) is scheduled for completion by October 18, 1998. This is a commitment. Program activities under Phase II are considered enhancements and no commitments are associated with Phase II.

A milestone in the DBD Program was previously identified in our February 7, 1997 response to NRC's request for information regarding the adequacy and availability of design basis information as a commitment, and is repeated here for completeness: The current schedule to issue the Surry and North Anna design basis documents (SDBDs and PDBD) is by June 30, 1999.

The design and licensing bases integrated reviews that support the UFSAR Improvement Plan Phase I validation effort will also be completed by October 18, 1998. However, other integrated reviews within the program that do not support Phase I UFSAR validation efforts are scheduled separately, and may not be completed by that time. Corrective actions initiated by the integrated reviews will be tracked and scheduled in accordance with the corrective action process.

A milestone in the ITS Program was previously identified in our March 27, 1997 letter (Serial No. 97-091A) to NRC regarding revised ITS schedule submittals as a licensing commitment and is repeated here for completeness: The current schedule for submittal of the proposed North Anna and Surry ITS license amendments is February and April 1999, respectively.

Within the Configuration Management Process Improvement Program, the actions to perform a broad-scope RCE and to conduct an assessment of change processes that could impact the integrity of the current licensing basis are licensing commitments. However, because the milestones for completing those actions are dependent on other project activities, no specific completion milestones are identified.

No commitments are made in support of the Information Systems Development Program or Project Management activities.

Comparison of the Integrated Configuration Management Project with the NRC Enforcement Policy on Departures from the FSAR

On October 18, 1996, the NRC revised its Policy and Procedures for Enforcement Actions (Enforcement Policy) associated with departures from the UFSAR. Given the variety of discrepancies from the UFSARs that had been identified over the recent past within the industry, the NRC concluded that additional enforcement guidance was necessary to address those findings and ensure the application of appropriate and consistent enforcement actions.

In developing the guidance, the NRC considered the following two principles: (1) The importance of licensees performing appropriate evaluations to ensure that there are not unreviewed safety questions or conflicts with Technical Specifications and (2) the importance of maintaining and controlling changes to the UFSAR so that both NRC and the licensee understand the regulatory envelope that has been established for the licensed facility. The changes to the Enforcement Policy implemented on October 18, 1996 made it clear to licensees that the NRC believes that failures in either area can be significant and can justify substantial regulatory action.

Virginia Power acknowledges the changes in the Enforcement Policy and is taking the initiative expected by the NRC. In recognition of its importance, the revised Enforcement Policy plays an important role in the approach and structure of the Integrated Configuration Management Project. To illustrate our sensitivity to various NRC positions expressed in Enforcement Policy, a comparison of several key NRC statements regarding the policy, as well as how they have been addressed by Virginia Power, is provided below.

“Application of this provision in the policy to past FSAR issues could encourage licensees to establish programs with goals to ensure full compliance with the FSAR licensing basis and determine if there are unknown unreviewed safety questions that have not been identified and addressed.” -- NRC Enforcement Policy Supplementary Information

Virginia Power has voluntarily established an initiative, the goals of which include ensuring that the design and operation of Surry and North Anna Power Stations are in full compliance with the FSAR licensing basis. The Integrated Configuration Management Project includes the complete validation of information currently contained in the Surry and North Anna UFSARs. Specific guidance is provided to ensure that previously unidentified unreviewed safety questions are identified and dispositioned during the validation process.

“The program has the capability of identifying departures from the FSAR that would not be expected to be identified through required surveillance and quality assurance activities.” -- NRC Enforcement Policy Supplementary Information

Virginia Power's initiative goes well beyond the level of scrutiny normally applied to the current licensing basis through routine surveillance and quality assurance activities. The review, validation, and corrective action activities implemented through the project are in addition to the routine surveillance and quality

assurance activities that will continue to be implemented through existing administrative controls throughout the course of the project.

"The policy provides that licensees should expand their reviews, as necessary, to identify other failures from similar root causes...the licensee should be taking broad corrective action to ensure that the licensee is meeting its licensing basis. The corrective action should have a defined scope and schedule." -- NRC Enforcement Policy Supplementary Information

The existing deviation reporting and corrective action system includes requirements for determining the root cause of the specific nonconforming condition and ensuring that corrective action is broad and comprehensive. The Integrated Configuration Management Project will utilize the existing corrective action system or, if necessary due to the magnitude of the project, establish a separate corrective action system for the duration of the project that fully meets the 10 CFR 50 Appendix B requirements for corrective action.

In addition to the corrective actions taken for individual findings, Virginia Power will conduct an evaluation into the root cause of departures of plant design and operations from the UFSAR licensing bases. The evaluation is intended to be broad in scope, examining management controls and processes at a higher level than determining the root cause of individual inconsistencies already addressed as part of the normal corrective action process described above. The team members implementing this effort are selected for their objectivity and their independence from the programs and processes evaluated. Information from the UFSAR content assessment recently performed in support of an industry initiative, the findings of other Virginia Power task team efforts over the years, and the results of a design and licensing bases integrated review pilot program are all factored into the broad-scope root cause evaluation (RCE). The findings and recommendations of the RCE team are then reviewed by management, and appropriate revisions to the Integrated Configuration Management Project are implemented.

Existing Virginia Power administrative controls and planned Integrated Configuration Management Project work instructions and project procedures ensure that each identified inconsistency is documented and its disposition tracked in a corrective action system with a defined scope and schedule.

"...a voluntary initiative (including either a formal program or informal effort where issues are identified through a questioning attitude of an employee), provided the licensee takes comprehensive corrective action and appropriately expands the

scope of the voluntary initiative to identify other failures with similar root causes.”
-- NRC Enforcement Policy Supplementary Information

Virginia Power's initiative includes both a formal program, the Integrated Configuration Management Project, and ongoing efforts that will be enhanced to further instill a questioning attitude within Nuclear personnel regarding the UFSARs and the current licensing basis.

The formal Integrated Configuration Management Project is comprehensive. It is founded on first ensuring a basic and complete understanding of the design basis for Surry and North Anna. Based on full knowledge of the design basis, the current content of the UFSARs is validated. In parallel, actions are planned to expand that body of information to better reflect other relevant CLB information through parallel efforts by improving UFSAR format and content. The operation of Surry and North Anna is validated for compliance with the current design and licensing bases. In addition to validating that the design and operation of the nuclear stations is in full compliance with the current design and licensing bases, comprehensive action is being taken to ensure that the programs and processes that implement change will continue to maintain the integrity of the current design and licensing bases in the future.

Less structured methods, such as the identification of a departure from the UFSAR due to the questioning attitude of an employee, have been an ongoing effort at Virginia Power for some time. Additional emphasis is planned on reinforcing that questioning attitude with respect to the UFSARs and the CLB.

The findings of the individual and broad-scope RCE described above will be factored into the Integrated Configuration Management Project activities, as appropriate, to ensure that our corrective actions are comprehensive and complete.

“If enforcement discretion is utilized, the licensee's voluntary initiative must be described in writing and be publicly available. The staff will reference and summarize the licensee's voluntary initiative, including the scope and schedule for corrective action, in an inspection report and will follow the licensee's corrective action until complete as an inspection report open item.” -- NRC Enforcement Policy Supplementary Information

This letter, which is available on the Surry and North Anna dockets, describes Virginia Power's voluntary initiative in writing to address departures from the UFSAR. As described elsewhere within this letter, the scope of the initiative is

to manage ongoing Virginia Power efforts associated with improving design and licensing basis information, validate the Surry and North Anna UFSARs, convert both stations to the ITS, and ensure compliance with the current design and licensing bases. The project initiative consists of seven distinct but closely-related activities. Virginia Power specifically commits to completing Phase I of the UFSAR Improvement Program as defined in this letter by October 18, 1998. Schedules for implementing corrective actions associated with inconsistencies that are identified as a result of the design and licensing bases integrated reviews--other than those associated with the UFSARs--will be scheduled and tracked in accordance with Virginia Power's corrective action program.

"...discretion would not normally be applied to departures from the FSAR if: (a) The NRC identifies the violation unless it was likely in the staff's view that the licensee would have identified the violation in light of the defined scope, thoroughness, and schedule of the licensee's initiative (provided the schedule provides for completion of the licensee's initiative within two years of this policy change.)"

"This section places a premium on licensees identifying issues before degraded equipment is called upon to work." -- NRC Enforcement Policy Supplementary Information

Virginia Power has developed comprehensive DBDs to support the configuration control process. It has initiated substantial additional activities through the Integrated Configuration Management Project to validate that operations and licensing documents associated with Surry and North Anna Power Stations are consistent with the design basis and licensing commitments. The project contains program elements, the scope and thoroughness of which will identify and correct departures from the Surry or North Anna UFSARs, will identify and disposition any previously unidentified unreviewed safety questions, and will effectively manage resources associated with the design and licensing bases activities in support of the continued safe operation of Surry and North Anna. Those actions are being implemented in a timely manner consistent with the expectations expressed by the NRC in its enforcement policy statement.